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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 ALLEN OWENS, individually,	Case No. 2:23-cv-00112-APG-VCF
10 Plaintiffs,	
11 v.	
12 GNLV, LLC; DOES 1-20 and ROE BUSINESS	
13 ENTITIES 1-20, inclusive,	
14 Defendants.	

15 **STIPULATION AND ORDER TO EXTEND**

16 **SCHEDULING ORDER DEADLINES [ECF NOS. 21, 24, 26]**

17 **(Third Request)**

18 Pursuant to LR IA 6-1, IA 6-2, 7-1, 26-1, and 26-3, plaintiff Allen Owens and defendant
19 GNLV, LLC hereby stipulate and agree to extend the current scheduling order deadlines by 60 days.
20 This is the third stipulation to extend this deadline. (*See* ECF Nos. 21, 24, 26.) The extension is
21 necessary to accommodate the parties' mediation of this case without incurring further litigation
22 expense.

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A. Discovery Completed to Date

The parties held the Rule 26(f) conference on February 28, 2023, and submitted the stipulated discovery plan and proposed scheduling order on March 10, 2023. This Court approved the discovery plan on March 13, 2023. Since then, the parties completed the following discovery:

1. Plaintiff has served his initial disclosures, including supplements to those disclosures with additional medical records.
2. Defendant has served its initial disclosures, including supplement to those disclosures with additional medical records obtained from Plaintiff's providers.
3. Plaintiff has served his first set of interrogatories and requests for production to Defendant.
4. Defendant has served its responses to Plaintiff's first set of interrogatories and requests for production.
5. Defendant has served its first set of interrogatories and requests for production to Plaintiff.
6. Plaintiff has served his responses to Defendant's first set of interrogatories and requests for production.
7. Defendant has obtained records about Plaintiff's medical treatments from Plaintiffs' providers.

B. DISCOVERY THAT REMAINS TO BE COMPLETED

The parties expect that they may need to conduct some or all of the following discovery:

1. deposition of Plaintiff;
2. deposition of Defendant's Fed. R. Civ. P. 30(b)(6) representative;
3. disclosure of the parties' experts;
4. deposition of the parties' retained experts;

5. deposition of percipient witnesses, including Plaintiff's treating providers; and
6. any additional records to be obtained during discovery.

**C. REASONS WHY THE REMAINING DISCOVERY WAS NOT COMPLETED
WITHIN THE TIME LIMITS**

The requested extension is necessary to accommodate the parties' upcoming mediation. The parties have scheduled a December 14, 2023, mediation for this case. The parties would like to prepare for that mediation without incurring further litigation expenses on discovery. And if mediation is somehow unsuccessful and the parties need to resume discovery, an extension of the pre-trial deadlines is necessary. This shows good cause for the requested extension of the pre-trial deadlines.

D. PROPOSED DISCOVERY SCHEDULE

Pursuant to LR 26-3, the parties propose to extend the pre-trial deadlines as follows:

	Original Deadline	Extended Deadline
Discovery Cut-Off Date	February 2, 2024	April 2, 2024
Amending Pleadings or Adding Parties	July 24, 2023	UNCHANGED
Rule 26(a)(2) Initial Disclosures	December 4, 2023	February 2, 2024
Rule 26(a)(2) Rebuttal Disclosures	January 3, 2024	March 4, 2024
Dispositive Motions	March 4, 2024	May 2, 2024
Pre-Trial Order	April 3, 2024, or 30 days after the decision on any dispositive motions (whichever is later)	June 3, 2024, or 30 days after the decision on any dispositive motions (whichever is later)

1 Dated: November 30, 2023

2 RICHARD HARRIS LAW FIRM

3 /s/Charles S. Jackson

4 Charles S. Jackson

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8 *Attorneys for Plaintiff Allen Owens*

Dated: November 30, 2023

WILSON ELSEER MOSKOWITZ EDELMAN
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/s/I-Che Lai

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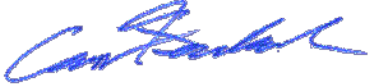
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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 12-1-2023